

# Exhibit G

*Excerpted*

1                   UNITED STATES DISTRICT COURT  
2                   SOUTHERN DISTRICT OF NEW YORK  
3                   NO. 10-cv-6950-AT-RWL

4 X-----X  
5                 H. CHRISTINA CHEN-OSTER, : CIVIL ACTION  
6                 SHANNA ORLICH; ALLISON      : DEPOSITION OF:  
7                 GAMBA; and MARY DE LUIS,     :  
8                 :  
9                 Plaintiffs,                :  
10                :                                    : EDITH A. HUNT  
11                vs.                        :  
12                :  
13                GOLDMAN, SACHS & CO. and    :  
14                THE GOLDMAN SACHS GROUP,    :  
15                INC.,                        :  
16                :  
17                Defendants.                :  
18                :  
19                X-----X

20               C O M P U T E R I Z E D    T R A N S C R I P T  
21               of the stenographic notes of the proceedings in  
22               the above-entitled matter as taken by and before  
23               MELISSA J. LUMI, a Certified Court Reporter, No.  
24               30X100237000, and Notary Public of the State of  
25               New Jersey, taken remotely, on September 30, 2020  
             commencing at 10:15 in the forenoon.

24               Job no. 4273283  
25               Pages 1 - 221

1 A P P E A R A N C E S:

2  
3 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

4 BY: MICHELLE A. LAMY, ESQ

5 ANNE B. SHAFER, ESQ.

6 275 Battery Street - 29th Floor

7 San Francisco, California 94111

8 Attorneys for the Plaintiffs.

9 SULLIVAN & CROMWELL, LLP

10 BY: AMANDA FLUG DAVIDOFF, ESQ.

11 LEILA R. SIDDIKY, ESQ.

12 1700 New York Avenue N.W. - Suite 700

13 Washington, D.C. 20006

14 Attorneys for the Defendants.

15 ALSO PRESENT:

16 Jim Roberts - Videotape Specialist

17 Gena Palumbo, Esq. - Goldman Sachs

18

19

20

21

22

23

24

25

1 process, based on recommendations that come up  
2 and get reviewed by a committee, were the topic  
3 of many career development panels that were held  
4 by divisions across the firm to help demystify  
5 the process so that people could understand how  
6 the processes worked and therefore lend an air  
7 of credibility to them, but those were not  
8 conversations that I was personally involved in.

9 Q. I'm asking specifically about the  
10 human capital management review with respect to  
11 gender. Was that something that was made known  
12 to employees?

13 MS. DAVIDOFF: Objection to form.

14 A. I do not know.

15 Q. We've discussed a little bit  
16 conversations you've had with Lloyd Blankfein  
17 regarding People survey. More broadly speaking,  
18 though, how involved was Mr. Blankfein with  
19 respect to diversity efforts at Goldman Sachs?

20 MS. DAVIDOFF: Objection to form.  
21 Vague.

22 A. And also I did not -- one of your  
23 words, how involved was Lloyd Blankfein in  
24 diversity what to the form?

25 Q. Efforts.

A. I would say Lloyd was very involved with diversity efforts. I would describe him as a champion.

(Court reporter clarification.)

A champion.

Q. And what would that description be based on?

A. The pattern of communication from the executive office, the number of times Lloyd would appear in front of different diverse groups as part of, you know, affinity network meetings, he helped us launch the firm wide network, the firm wide women's network, he helped launch the women's network within fixed income currencies and commodities, and a general egalitarian fairness-minded individual. As someone who came from an underprivileged background himself, he really embraced all concepts for diversity.

Q. Did you and Mr. Blankfein ever discuss how women performed compared to men in the 360 review?

A. We did not.

Q. Do you know whether Mr. Kennedy ever had that conversation with Mr. Blankfein?

A. I do not.

1 being presented.

2 I don't recall that I specifically  
3 had a personal conversation with Lloyd about it,  
4 but I think the cross-ruffing process is one  
5 where we really took extra steps to ensure that  
6 there was gender equality involved in the process  
7 and I'm sure that he would have been very much  
8 aware of that and very much interested in  
9 results.

10 Q. Did you ever have conversations  
11 with Mr. Blankfein about a gender pay gap at  
12 Goldman Sachs?

13 MS. DAVIDOFF: Objection.  
14 Foundation.

15 A. I did not.

16 Q. Do you know if Mr. Kennedy had a  
17 conversation with Mr. Blankfein about a gender  
18 pay gap at Goldman Sachs?

19 MS. DAVIDOFF: Objection to form.

20 A. I do not.

21 Q. Are you aware of any  
22 recommendations made to Mr. Blankfein about  
23 diversity that he did not support?

24 A. Not that I recall.

25 Q. How involved was David Solomon

1           with diversity efforts at Goldman Sachs?

2           A.       During the era when I was  
3 responsible for all of the human resources  
4 activities of the fixed income currencies and  
5 commodities division, David was very actively  
6 involved in the initiatives.

7           Q.       Was Mr. Solomon involved on  
8 diversity issues while you were head of GLD?

9           A.       I don't exactly have a tracking of  
10 David Solomon's career in my mind, but at one  
11 point he became co-head or head of IBD, the  
12 investment banking division. The fact that there  
13 was the presentation on diversity to the  
14 investors banking division operating committee,  
15 generally those things happened because they're  
16 requested by someone. So I would surmise that  
17 that was something that was produced at David's  
18 request.

19           David was very involved in the  
20 recruiting activities for the firm and he was  
21 actually the head of the firm wide recruiting  
22 committee.

23           Q.       Did you ever meet directly with  
24 Mr. Solomon regarding diversity issues?

25           A.       I would have met with David

1           Solomon during the divisional business plan  
2       review for the investment banking division, if,  
3       in fact, he were a division head at that time.

4           Q.       Other than through the business  
5       plan review, do you recall meeting with Mr.  
6       Solomon regarding diversity issues?

7           A.       I don't specifically recall.

8           Q.       Do you know whether Mr. Kennedy  
9       met with him regarding diversity issues?

10          A.       I don't know.

11          Q.       Did you ever have a conversation  
12       with Mr. Solomon about how women performed  
13       compared to men in the 360 review?

14          A.       No.

15          Q.       What about the manager quartile?

16          A.       No.

17          Q.       What about a gender pay gap at  
18       Goldman Sachs?

19          A.       No.

20          Q.       Do you know whether Mr. Kennedy  
21       had conversations with Mr. Solomon on any of  
22       these issues?

23          A.       I do not.

24          Q.       Are there any recommendations that  
25       GLD made that Mr. Solomon did not support?

1 A. Not that I am aware.

2 Q. How involved was Gary Cohn with  
3 diversity efforts at Goldman Sachs?

4 A. I'm sorry. I didn't hear the  
5 beginning of that question.

6 Q. How involved was Gary Cohn with  
7 diversity efforts at Goldman Sachs?

8 A. I would say that Gary was also a  
9 champion.

10 Q. How often did you meet with Mr.  
11 Cohn regarding diversity issues?

12 A. Specifically one-on-one with him  
13 for diversity issues, I don't recall, but it was  
14 not often.

15 David was a big proponent of the  
16 firm wide black network, and he met very often  
17 with leaders of that affinity group and members  
18 of that affinity group.

19 Q. So you mentioned David just now,  
20 but to be clear, I'm asking about Gary Cohn. Is  
21 your answer the same?

22 A. Which answer are you referring to?

23 Q. How often did you meet with Mr.  
24 Cohn regarding diversity issues?

25 A. Infrequently, if ever.

1                   the U.S.

2                   Q.         Do you know who Jay Michael Evans  
3                   is?

4                   A.         Yes.

5                   Q.         Do you recall Mr. Evans role with  
6                   respect to diversity efforts at Goldman Sachs?

7                   A.         You know, I seem to recall him as  
8                   fairly proactive, but I could not identify  
9                   specific things that he did like I was able to do  
10                  for some of the other people we've discussed, but  
11                  Mike was generally highly attune to human capital  
12                  issues.

13                  Q.         We've discussed Mr. Paulson. Do  
14                  you recall who that is?

15                  A.         I'm sorry. I didn't hear the  
16                  name.

17                  Q.         Hank Paulson.

18                  A.         Oh, Hank Paulson. Yes. I know  
19                  him.

20                  Q.         Would you say that Mr. Paulson was  
21                  actively involved in diversity efforts at Goldman  
22                  Sachs?

23                  A.         Yes.

24                  Q.         Did he receive reports from you  
25                  about diversity efforts at Goldman Sachs?

1 diversity at Goldman Sachs. Do you recall that?

2 A. I do.

3 Q. Did Mr. Cohn have a unique role  
4 within the firm in terms of monitoring or  
5 advancing diversity efforts?

6 MS. DAVIDOFF: Objection to form.

7 A. One, he was president of the firm,  
8 so I think by definition he had a particular role  
9 in advancing diversity issues at the firm. I  
10 know for a time he was the management committee  
11 sponsor for the firm wide black network, so I  
12 know he had a specific role there. He might have  
13 had other roles as well that I don't recall at  
14 the time.

15 I do recall a time early in fixed  
16 income when I was still there and he was one of  
17 the heads of fixed income division, we would have  
18 summer interns come to the firm and we always had  
19 a substantial portion of black and Latino interns  
20 as part of building our pipeline and we would  
21 have an general orientation and we would have a  
22 specific orientation with our underrepresented  
23 minorities and Gary would come and I remember one  
24 time he said, I am here this summer, I am in town  
25 all week, my family is out in the Hamptons, that

1 means four nights a week I am available for  
2 dinner, so please, get yourselves together in  
3 small groups and get on my calendar because I  
4 want to have dinner with you.

5 Now, for a very senior management  
6 committee person at that point in time to extend  
7 that general open invitation to a group of  
8 analysts and associates who are summer interns I  
9 think speaks to the kind of commitment that he  
10 was sharing way in advance of the 2001 diversity  
11 task force.

12 Q. You also testified that Mr.  
13 Blankfein was a champion of diversity at Goldman  
14 Sachs. Do you recall that?

15 A. I do.

16 Q. Did Mr. Blankfein have a unique  
17 role within the firm in terms of monitoring or  
18 advancing diversity efforts?

19 MS. DAVIDOFF: Objection to form.

20 A. Well, he did lead the 2001  
21 diversity task force, and therefore, as he  
22 continued to take on more and more senior  
23 leadership roles in the firm, he personally  
24 embraced them, and he was the one who developed  
25 the idea for a 2006 diversity task force shortly

1 C E R T I F I C A T E  
2  
3  
4

5 I, MELISSA LUMI, a Certified Court  
6 Reporter and Notary Public of the State of New  
7 Jersey certify that the foregoing is a true and  
8 accurate Computerized Transcript of the  
9 Deposition of Edith Hunt, who was first duly  
sworn by me.

10  
11 I further certify that I am  
12 neither attorney, of counsel for, nor related to  
13 or employed by any of the parties to the action  
14 in which the Depositions are taken, and further  
15 that I am not a relative or employee of any  
16 attorney or counsel employed in this case, nor am  
17 I financially interested in the action.

18 Dated: October 1, 2020

19  
20   
21

22  
23 MELISSA LUMI, C.C.R.  
24  
25